

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

*In Re* Flint Water Cases

Case No. 16-cv-10444  
Hon Judith E. Levy  
United States District Judge

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**SUPPLEMENTAL DECLARATION OF ARTHUR WOODSON**

Pursuant to 28 U.S.C. § 1746, I, Arthur Woodson, hereby declare as follows:

1. I am a Flint, Michigan resident, and an advocate for the residents of Flint, where I have resided since before April 2014.
2. I previously provided a Declaration on Tuesday, February 6, 2023, explaining I had been contacted by Actum, a public relations firm that represents Veolia.
3. I was asked to comment for a story about attorney Corey Stern that had nothing to actually do with Veolia's role in the Flint Water Crisis, which on its own and now in retrospect was strange.
4. I also sent a letter directly to the Court, which contained the same information as what was in my Declaration, because I had not seen my Declaration on the docket.
5. Since that time, on Wednesday, February 6, a show aired on YouTube called *Roland Martin Unfiltered*.
6. In my original Declaration, and in my letter to the Court, I did not inform the Court that in addition to being contacted by Actum, I was also contacted by *Roland Martin Unfiltered* and asked to appear on the show to discuss the ten-year anniversary of the start of the Flint Water Crisis.
7. I did not originally consider a connection between the call I received from Actum and the request from *Roland Martin Unfiltered*.

8. I now understand that the call I received from Actum was entirely related to call I received from the show.
9. I now know that at the same time, Actum was also reaching out to other Flint residents and advocates, in particular to [REDACTED]  
[REDACTED]
10. [REDACTED] has been a public advocate for Flint, known nationally for her advocacy since she was a very young girl, and is highly respected in our community for her work.
11. I was provided, and with her permission I have attached screen shots here, showing that Rachel Noerdlinger, an Equity Partner at Actum, contacted [REDACTED] on Tuesday, February 6, the same day I was contacted by her Actum colleague, Paul Persuad.
12. Noerdlinger attempted to connect [REDACTED] with a New York Post reporter, and also informed [REDACTED] that Stern's comments would be discussed on the *Roland Martin Unfiltered* show.
13. One day later, on Wednesday, February 7, the *Roland Martin Unfiltered* show aired, wherein Mr. Martin claimed that Flint residents were outraged over a resurfaced podcast from 2018 on which Stern appeared.
14. After the episode aired, Actum sent a press release to the media, claiming Flint residents were outraged over Stern's 2018 comments, as highlighted on the show.
15. Before my being contacted by Actum or the show, I know of no residents who, at that time, were discussing Stern's comments or expressing outrage over them.
16. But it is now clear that Actum/Veolia were actively seeking to place "stories" in print/online media about Stern's comments from 2018, and likely placed the "story" on *Roland Martin Unfiltered*, for Actum/Veolia to use as the hook for other media outlets to cover it.
17. This is evident in Actum's subsequent press release, where Actum points to the *Roland Martin Unfiltered* episode, as a breaking story,

claiming residents are outraged over the unearthed podcast. I was able to obtain the press release as have other members of my community. I have attached it here.

18. I now know, and it should be obvious to everyone, that Actum/Veolia were trying to hurt Stern for Veolia's benefit, using Flint residents as pawns for that purpose.
19. While it is sad that the only people who did not realize this were Paul Egan and others from the Detroit Free Press (who subsequently published a hit-piece about Stern centering on the podcast), my sincere hope is that they were just naïve and not complicit in Veolia's scheme. If they were complicit, that would not be considered "journalism," and it would be a very sad day if one of the few reporters still writing about Flint was actively and knowingly assisting a defendant in attacking their legal adversary.
20. It is also highly offensive that Actum and Veolia believe the residents of Flint are not smart enough to see that Veolia and its public relations groups are trying to create a nasty narrative in Flint about the only attorney who actually fought for residents during a six-month trial against Veolia for its role in the crisis.
21. Perhaps because I am not a lawyer, I cannot understand how this conduct is allowed in federal court, or in any court, and how it is not considered criminal.
22. Ironically, Veolia is attempting to publicly harm the one lawyer still pursuing Veolia for its role in the crisis, by attempting to create "outrage" about him in the very community he has been advocating for and trying to protect since 2015.
23. Veolia is essentially trying to re-poison my community after already poisoning and failing to protect us in 2015.

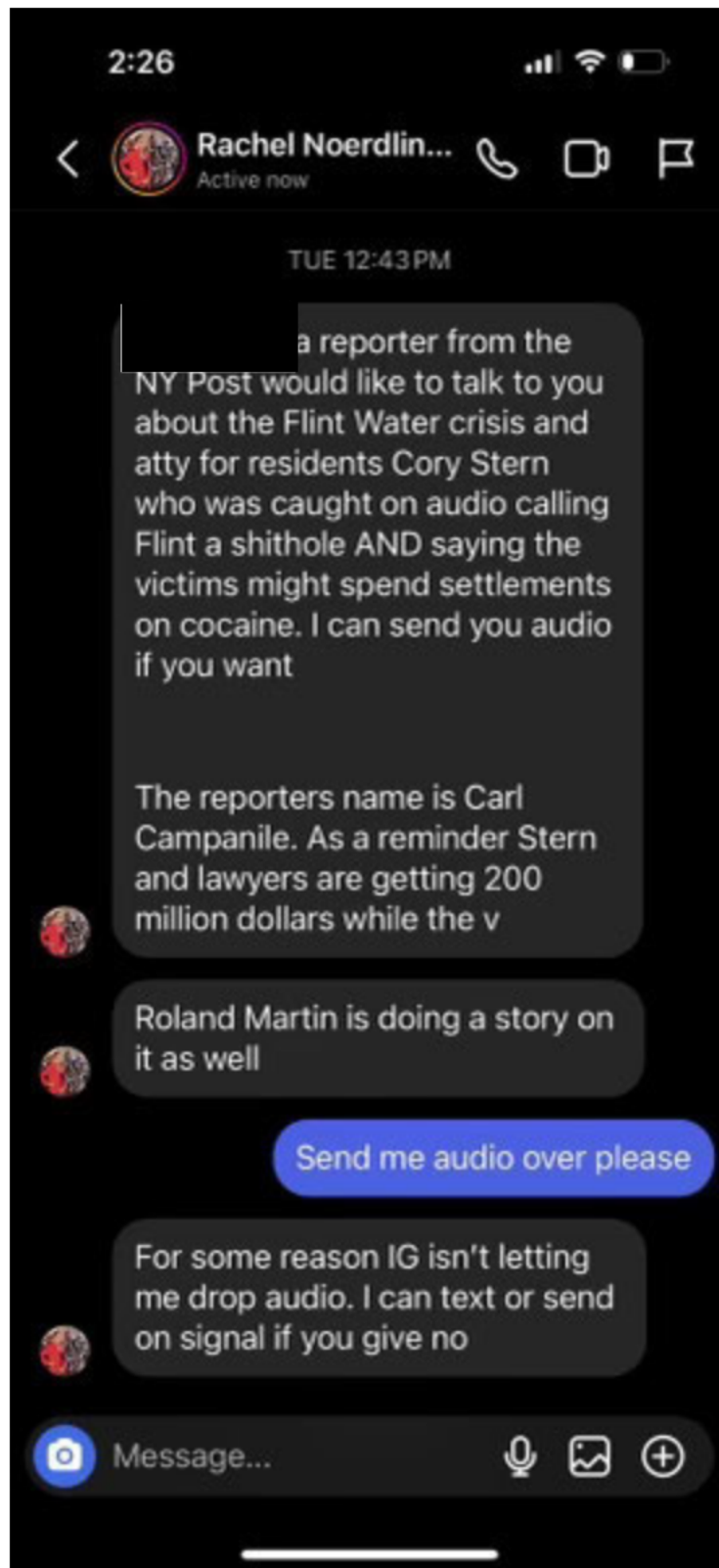
I declare under penalty of perjury that the foregoing is true and correct.

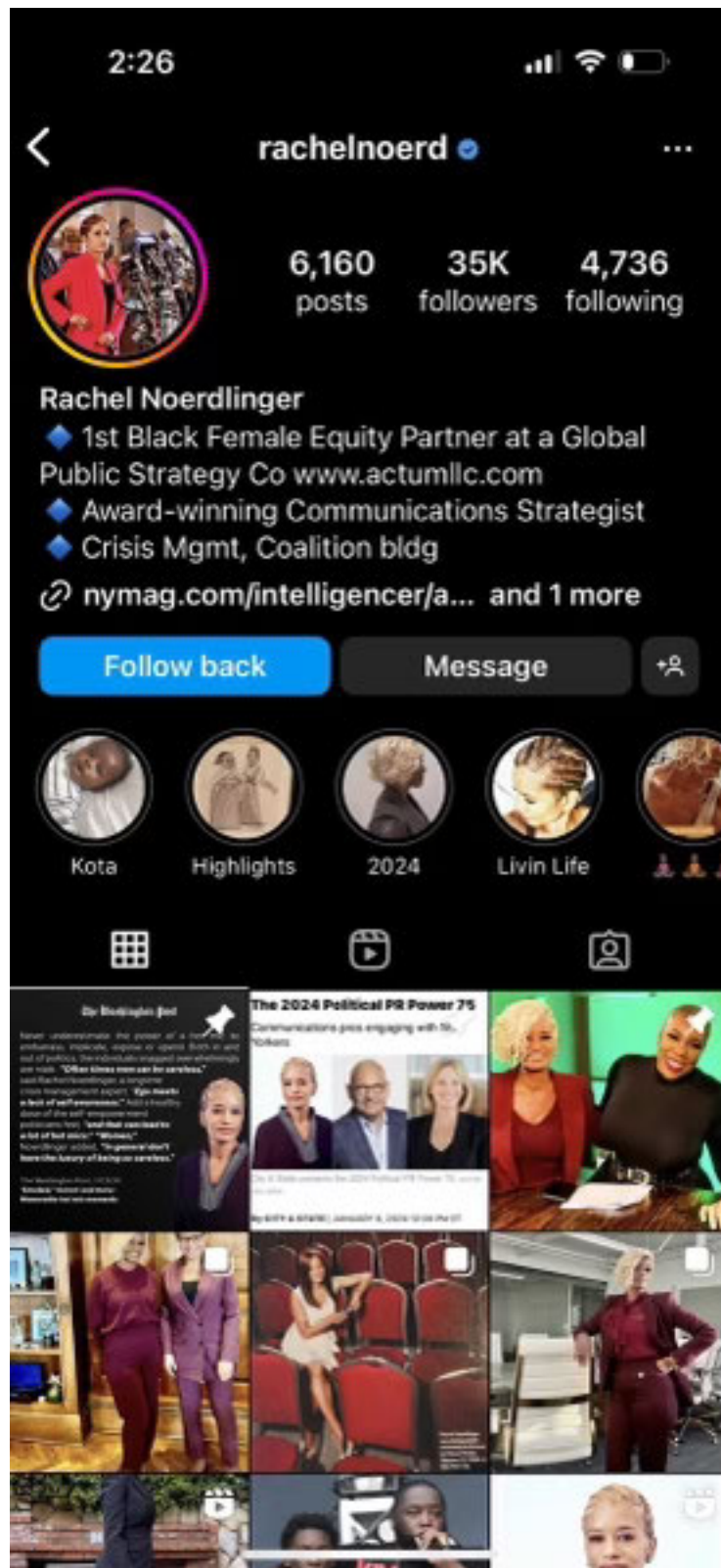
Executed on February 11, 2024

Flint, Michigan

/s/ ARTHUR WOODSON

Arthur Woodson







Greetings,

Yesterday, one of the lawyers for victims of the Flint Water Crisis, was exposed for making derogatory comments about his clients and the city of Flint, even as their case has made him and his fellow lawyers nearly two hundred million dollars. The resurfaced audio of lawyer Corey Stern aired on [last night's episode](#) of RolandMartinUnfiltered.

The resurfaced audio included a clip of Stern calling Flint **“a shithole” where “no one wants to be”** and saying that his job is to structure the settlement money in a way that will **keep his clients in Flint from spending all the money on cocaine.**

After hearing Stern's comments, attorney A. Scott Bolden said: “Those [comments] are highly inappropriate under most state bar associations and most court rules, whether it's federal or state... Speaking against the interest - or speaking against your client - actually creates a conflict of interest for you, whether it's real or perceived... so that's highly inappropriate. ... Whoever he represents certainly could make a motion to the court to either limit his fee, or they could bring a complaint against him to his state or local bar association for those comments. Especially if he was representing those residents at the time he made those comments.” ([link](#))

Flint Pastor Kevin Thompson expressed his dismay as well: “It's disheartening, and there should be an apology - if it's from the heart. If not, keep it to yourself. I'll stop there.” ([link](#))

The exposure of Stern's racist remarks come just ahead of the 10-year anniversary of the Flint Water Crisis. In the decade since the crisis, not a single government official responsible for the catastrophe has been held accountable, and residents have yet to see a dime from the \$626 million settlement with the State of Michigan.

The full segment can be seen on [Youtube](#) at the 52:56 mark.

# Actum

STRATEGY EXECUTION OUTCOMES

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